

SOUTH DELTA WATER AGENCY

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504 BANK OF STOCKTON BUILDING
311 EAST MAIN STREET
STOCKTON, CALIFORNIA 95202
TELEPHONE (209) 943-5551

Chairman
Jerry Robinson
Vice-Chairman
Peter Alvarez
Secretary
Alex Hildebrand

Directors:
Robert K. Ferguson
Natalino Bocchetti

Counsel:
Wilson, Hoslett & Whitridge
Engineer:
Gerald T. Orlob

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Comment by SDWA on the Operation Studies which the SWRCB
Requested the Department of Water Resources To Conduct
Per The August 18 Letter From Howard To Barnes

The South Delta Water Agency is concerned that studies relating to San Joaquin River flows at Vernalis are apparently being conducted with assumptions that are unrealistic and which even violate Board standards and water right responsibilities.

1. It is our understanding that all of the alternatives are being analyzed with ostensible compliance with the Vernalis salinity standard, but that the New Melones water quality releases made in the studies to comply with this standard are limited to 70,000 acre-feet in any one year. Decision 1422 contains no such limit, and the Board has received ample data indicating that 70,000 acre-feet is far from adequate to comply with the standard. The studies, therefore, substantially overstate the availability of water for fish flows. The Board should not entertain studies that seriously violate a Board standard while pretending to comply.

2. It is our understanding that the studies do not provide Vernalis flows in June, July, and August that are sufficient to supply riparian and superior pre-1914 water rights in the South Delta. To the extent that these flows are not provided, the studies overstate the availability of water in the watershed to meet the proposed fish flows.

3. It is our understanding that no New Melones water is assumed to be delivered to eastern San Joaquin County for replacement of groundwater overdraft in accordance with USBR contracts. We believe that an assumption of noncompliance with these contracts for this important purpose should be clearly acknowledged and the consequences addressed.

4. We have previously testified that more than half of the annual water quality release requirement from New Melones typically occurs between March 1 and the late April start of fish flows. These releases result almost entirely from the need to dilute drainage entering the River from Salt and Mud Sloughs during that time. In 1993 it would have taken about 100,000 acre feet of New Melones release to meet the standard in March and April if the standard had been met. If the Salt and Mud Slough drainage were retained for release during the spring fish flows, the annual New Melones water quality release requirement would, therefore, be substantially reduced. In view of the overcommitment of available water in New Melones and in the entire San Joaquin watershed, we believe it is important to adopt a requirement that drainage and fish flows must be managed so that fish flows serve also to dilute drainage flows.